



## **Response to the Productivity Commission Draft report: Childcare and Early Childhood Learning**

5<sup>th</sup> September 2014

As Australia's 9<sup>th</sup> largest university with a strong focus on strengthening the communities it serves, leading innovative education approaches and engaging in cutting-edge research, Deakin University welcomes the opportunity to provide comment on the Productivity Commission's Draft Report into Childcare and Early Childhood Learning. This response to the Productivity Commission's Draft Report has been compiled by Professor Andrea Nolan, Professor of Education (Early Childhood), in collaboration with the Early Childhood Teaching and Research Team at Deakin University, Melbourne, in particular Llewellyn Wishart, Dr Janet Moles, Dr Anne-Marie Morrissey, and Dr Anna Kilderry.

Building a strong platform for healthy development and effective learning in the early years is linked to the provision of nurturing and responsive quality experiences and programmes for young children. Therefore, any decisions regarding early childhood education and care services (ECEC) needs to be informed by empirical evidence and possible implications considered carefully. It is reassuring to note that the Commission report recommends that state and federal governments should maintain preschool program funding as a priority area, recognising that both formal and informal ECEC services play a vital role in the development of Australian children, their learning and their preparation for school. The benefits from young children participating in quality preschool programs is evidenced in the research literature (Sammons, 2010; Sylva et al. 2010; Howes et al. 2006). Quality programs include providing nurturing learning programs, creating and enhancing family and community networks, and the early childhood service being positioned as a trusted source of information and support for families and communities (Mitchell, Wylie & Carr 2008; OECD 2001).

We also welcome and support the retention of the National Quality Framework for ECEC services and its proposed extension to all Government funded services. This Framework has shown that it has the capacity to raise the quality of services and act as a driver for continuous improvement and

consistency across Australia. Another positive move is providing services with access to capacity-building assistance to cater for the diverse needs of individual children and for children in highly disadvantaged communities, and to facilitate the integration of ECEC with schools and other services.

While we applaud some of the recommendations proposed in the draft report, we also question others. One of our main concerns is that the inquiry is not framed from a child's rights perspective but rather a 'women in the workforce' and 'participation / economic' perspective. Having the rights of the child at the centre ensures that the decisions made will be in the best interests of children and will not undermine the significant progress made by the ECEC field in the last decade, in particular, in relation to professionalization and quality practice.

This response will focus on the recommendations we believe we have the expertise on which to comment.

### **Families using mainstream services – improving the accessibility, flexibility and affordability**

#### **DRAFT RECOMMENDATION 8.5**

*Governments should allow approved nannies to become an eligible service for which families can receive ECEC assistance. Those families who do not wish their nanny to meet National Quality Standards would not be eligible for assistance toward the costs of their nanny. National Quality Framework requirements for nannies should be determined by ACECQA and should include a minimum qualification requirement of a relevant (ECEC related) certificate III, or equivalent, and the same staff ratios as are currently present for family day care services. Assessments of regulatory compliance should be based on both random and targeted inspections by regulatory authorities.*

#### **Response:**

To ensure equity across ECEC and to ensure quality practice, it is pleasing to see that nannies will be required to hold an initial qualification, Certificate III, the same qualification as Family Day Care workers. Nannies should therefore be subject to the same conditions as Family Day Care workers, including, being a member of an accredited scheme, and working under the supervision of an appropriately qualified and trained supervisor.

## **Additional needs children and services – improving the accessibility, flexibility and affordability**

### **DRAFT RECOMMENDATION 5.2**

*Governments should plan for greater use of integrated ECEC and childhood services in disadvantaged communities to help identify children with additional needs (particularly at risk and developmentally vulnerable children) and ensure that the necessary support services, such as health, family support and any additional early learning and development programs, are available.*

#### **Response:**

In ECEC in Australia, practice is implemented largely across the health, education and community services sectors. Within these sectors, silos of practice exist (Press and Woodrow, 2005) which restrict the opportunities for knowledge exchange, create duplication of services and contribute to increased costs (Macfarlane, 2010). Moreover, lack of knowledge exchange means that new ideas and approaches in particular sectors are often not understood in others, this acts to increase protectiveness of individual knowledge bases and fosters suspicion that decisions about particular practice approaches are not evidence-based (Cheeseman, 2007). Such factors undermine, rather than enhance possibilities for knowledge sharing and exchange, break down possibilities for successful integration of services and also result in less inclusive practices in work with young children and their families (Nolan, Cartmel & Macfarlane, 2012; Moore & McDonald, 2013).

The findings of Best Start (Raban et al. 2006), a Victorian Government initiative located in vulnerable communities to improve the health, development, learning and wellbeing of all young children across Victoria from pregnancy through transition to school, point to the importance of practices that are flexible, add value, involve service cooperation and additional resources, and focus on making personal connections with families.

However, there needs to be investment in preparing the workforce for the introduction of an integrated services model, the infrastructure put in place that is required for this to be enacted, and the education needed in the move from siloed to integrated practice (Macfarlane, Cartmel & Nolan, 2014). An examination of integrated services (Macfarlane, Cartmel & Nolan, 2014) points to a lack of an integration strategy, which would work to outline the steps necessary for collaboration and integration, and facilitate its achievement. While the federal Australian government intention in this policy may indeed be genuine, the financial commitment is lacking.

## **INFORMATION REQUEST 8.2**

*The Commission is seeking feedback on the role that integrated services can play in making ECEC more accessible for families. In particular, the Commission is interested in:*

- the extent to which integrating ECEC services with other family services and schools will deliver benefits to families and/or ECEC providers, and in particular, Indigenous and potentially other disadvantaged communities*

### **Response:**

Services taking a collaborative and integrated approach are strongly associated with positive outcomes for families and communities (McArthur & Thomson 2011; Nair 2012). The impact of disadvantage can be either mitigated or exacerbated by the quality of the service (NSW Department of Community Services 2005; Australian Institute of Family Studies 2005; Melhuish 2003; Sylva et al. 2004). While research clearly points to the fact that children from families with poor social supports, or who make little or no use of community support services are more at risk of poor health, education and development outcomes (CCCH 2010), a family's engagement with community services is influenced by whether or not they feel valued and appreciated (Wilkinson 2005; Hayes 2008).

Services that provide extra support for families and assist in addressing their priorities are viewed as developing reciprocal links between services and recognised as important in engaging more vulnerable families (Nair 2012; Soriano, Clark & Wise 2008). It has been acknowledged that playgroup and occasional care programs act as 'soft' entry points (Soriano, Clark & Wise 2008) into the more formalised educational preschool programs.

A case study by Nolan (2013) focuses attention on the actions of a local council of a large, provincial centre and the community responses from those involved around the issue of engaging highly disadvantaged families with challenging and complex needs in quality, accessible early childhood services. It outlines the development of a new preschool service model that was implemented in two suburbs. The study shows that adding capacity to the kindergarten program by offering other services, taking an interagency approach, added value for parents and children attending the kindergarten. Participation rates went up, there was less absenteeism, community support was high for the program, and the parents felt connected. The teachers noted a marked improvement in the children's skills, knowledge and confidence. This model created a smooth transition to other services. Rather than positioning the service as an 'intervention' for 'needy' families, it is situated as

a mainstream service for the community – a centre for children *and* families. These families are now engaged with a service that responds to their needs in a holistic way.

### **Preschool — supporting universal access**

#### **DRAFT RECOMMENDATION 7.9**

*Dedicated preschools should be removed from the scope of the National Quality Framework and regulated by state and territory governments under the relevant education legislation. The quality standards in state and territory education legislation should broadly align with those in the National Quality Framework. Long day care services that deliver preschool programs should remain within the National Quality Framework.*

#### **Response:**

The proposal to remove preschools from the scope of the NQF makes little sense in terms of a harmonisation agenda for a national approach to early childhood education and care – something that the field has been moving away from in more recent years, as it is not in the best interests of young children and their families. It would simply result in a two-tiered education and care system for preschool aged children. Implementing such a move would be promoting a direction in service delivery that would result in more inefficiencies, duplication of administrative and regulatory frameworks across all Australia’s jurisdictions with regard to preschools. Such a move would signal a return to idiosyncratic decision making by the states in relation to regulations, curriculum, teacher preparation and more. We also question how the quality of such programmes would be assured and assessed (Clarke-Stewart & Allusen, 2005).

With early childhood services combined under a national approach, a holistic approach to service delivery is ensured. This will eliminate service fragmentation, duplication, and will allow for the monitoring and supporting of quality services in a systematic and cost effective way.

### **Outside school hours care — improving the accessibility, flexibility and affordability**

#### **DRAFT RECOMMENDATION 7.4**

*Governments should develop and incorporate into the National Quality Framework a nationally consistent set of staff ratios and qualifications for those caring for school age children in outside school hours and vacation care services. These requirements should take into consideration ratios that are currently acceptable for children during school hours, the uncertainty surrounding the*

*additional benefits of more staff and higher qualifications, and the valuable contribution that can be made to outside school hours care services by less qualified older workers and university/TAFE students.*

**Response:**

Research has demonstrated the benefits of lower staff / child ratios and improved staff qualifications in school-age care, especially relating to children's behaviour (Simonchini, Caltabriano & Larsen, 2012). Programs with high numbers of children and few staff were found to have detrimental outcomes for the behaviour of children. Furthermore, staff turnover tends to be high and this creates inconsistency for children which further exacerbates behavioural issues. Staff with higher qualifications are more likely to understand children's perspectives and manage programs with greater sensitivity, providing effective services (Petrie, 1999; Rosenthal, 1999). It appears a positive move to develop a NQF for outside school hours care and vacation care services.

**Quality assurance processes and regulation of ECEC**

**DRAFT RECOMMENDATION 7.1**

*To simplify the National Quality Standard, governments and ACECQA should:*

- *identify elements and standards of the National Quality Standard that can be removed or altered while maintaining quality outcomes for children*
- *tailor the National Quality Standard to suit different service types — for example, by removing educational and child-based reporting requirements for outside school hours care services.*

*Requirements for educators in centre-based services should be amended by governments such that:*

- *all educators working with children aged birth to 36 months are only required to hold at least a certificate III, or equivalent*
- *the number of children for which an early childhood teacher must be employed is assessed on the basis of the number of children in a service aged over 36 months.*

**Response:**

We view these proposed changes as utterly unacceptable as all available research evidence indicates that higher quality care and education outcomes follow higher levels of training and education of early childhood educators (Sylva et al. 2003). Limiting education and training levels for educators

working with children under 3 years of age to only Certificate III level does a profound disservice to younger children in terms of access to higher quality care and education. Certificate III is an entry level training only in the ECEC field and does not prepare practitioner's for the complexity of planning and leading the education and care of under 3's children in centre based environments. Of great concern is that Certificate III training would not enable educators to pick up subtle development and learning issues so that intervention can begin early on in a child's life, which research positions as beneficial for children's development and later achievements in life (Melhuish, 2003; Peisner-Feinberg et al.,1999).

The agenda within the NQF to extend the presence of degree educated early childhood teachers to all children within centre-based environments was an important, evidence-based reform. To do away with this reform in this instance suggests that the rights of children under 3 to be educated is a second order priority.

#### **INFORMATION REQUEST 7.1**

*The Commission seeks participants' views on the expected impacts on the development of children under 36 months of focusing required teachers in centre-based care on children over 36 months.*

#### **Response:**

Research (Urban et al., 2012 p. 509) argues that it is essential in providing quality ECEC to: promote professionalism in early childhood across all layers of the professional, including practice, management, qualification and training, and research; improve pre- and in-service training of the ECEC workforce; and develop an understanding of qualification requirements for the ECEC workforce that shares common values and respects the diversity of approaches.

It is now increasingly clear that the relationships, experiences and environments a child is exposed to in the first few years of life are crucial to his or her long-term health, development, learning and wellbeing and set the foundations for future growth (Press & Hayes 2000; Harrison & Ungerer 2000; Shonkoff & Phillips 2000). There appears to be a prevailing view that teachers in childcare programmes do not have anything to contribute to programmes for children under three (Ireland, 2006; Rouse, Morrissey & Rahimi, 2012). This is concerning when we know that children's experiences in the first three years of life are a critical influence on later learning and development, and that higher level staff qualifications are linked to better quality programmes for this age group

(Ireland, 2006; Norris, 2010; Whitebook, 2003). By lowering the qualification level means that lesser trained staff are dealing with children who are in their most impressionable stage of development. If strong foundations are not laid down during this period then children are on a path to disadvantage (Hertzman, 2002).

The Common European Principles for Teacher Competences and Qualifications (European Commission, 2005) proposes that (school) teaching needs to be seen as a graduate profession at Masters Level. Urban et al. (2012) therefore argue that 'there can, in principle, be no justification for applying different (i.e. lower) standards to the early childhood profession. From a systemic perspective, it should be added that inclusive professionalization needs diversification as well as a general increase of formal qualifications. This means that the full range of qualifications, including MA and doctoral level must be available to the ECEC profession' (p.520). This has been evidenced (Penn, 2011) as enhancing quality outcomes for young children's ongoing learning and development.

#### **DRAFT RECOMMENDATION 7.5**

*To provide services with greater flexibility to meet staffing requirements, ACECQA should:*

- remove the requirement that persons with early childhood teacher qualifications must have practical experience for children aged birth to twenty four months*
- explore ways to make the requirements for approving international qualifications simpler and less prescriptive in order to reduce obstacles to attracting appropriately qualified educators from overseas.*

*All governments should allow services to temporarily operate with staffing levels below required ratios, such as by maintaining staffing levels on average (over a day or week), rather than at all times.*

#### **Response:**

It is now an accepted fact that the early years of childhood are a critical period in every child's life where rapid growth and development take place. Research, notably longitudinal studies tracing the effects of early disadvantage, also identifies early childhood as a key time of life. Major reports over the past decade, in the UK, Canada and the USA, have emphasised the importance of early childhood and the rewards gained from investment in these years. The experiences and relationships a child has, plus nutrition and health, can play a major contribution and predictor of long-term outcomes (Feldman, Weller, Zagoory-Sharon, & Levine, 2007; Meaney, 2010). This means that early childhood teachers need to understand how to build and maintain relationships with young children and provide them with appropriate learning experiences. It is clear from the research literature that



more highly trained staff are more able to do this (Bueno, Darling-Hammond, & Gonzales, 2010; Saracho & Spodek, 2007). Experience with very young children during training ensures a good understanding of child development and learning ensuring quality programmes. Qualified early childhood teachers need this knowledge to work with children from birth to 8 years which is the universal categorisation of early childhood.

#### **DRAFT RECOMMENDATION 11.1**

*Governments should ensure, through regulatory oversight and regular audits by the Australian Skills Quality Authority, that Registered Training Organisations maintain consistently high quality standards in their delivery of ECEC-related training.*

#### **Response:**

Governments need to ensure that there are education and training courses in place which equip early childhood educators with the skills and knowledge they require to be effective in the work they undertake with young children, families and professional colleagues. The growth of Registered Training Organisations across the sector does need monitoring to ensure that quality education and care courses are being offered, as currently this cannot be guaranteed.

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